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6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148

MAINOR WIRTH, LLP

1	BRADLEY S. MAINOR, ESQ.
2	Nevada Bar No. 7434 JOSEPH J. WIRTH, ESQ.
3	Nevada Bar No. 10280 ASH MARIE BLACKBURN, ESQ.
4	Nevada Bar No. 14712 MAINOR WIRTH, LLP
5	6018 S. Fort Apache Road, Ste. 150
6	Las Vegas, NV 89148-5652 Tel: (702) 464-5000
7	Fax: (702) 463-4440 ash@mwinjury.com
8	Counsel for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

	CDS
MACKENZIE STRABALA,	CASE NO: 2:21-cv-01537- JAD -EJY
Plaintiff	
vs.	STIPULATION AND ORDER TO
	EXTEND JOINT PRETRIAL ORDER
MID-CENTURY INSURANCE	DEADLINE (FIRST REQUEST)
COMPANY, a domestic stock; DOES I	
through XX, inclusive; and ROE	

Defendants.

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-captioned matter. Good cause exists to extend the deadline for the reasons explained below.

A. Reasons For the Extension

CORPORATIONS I through XX, inclusive;

On August 9, 2022, deciding the matter in chambers, Judge Elayna Youchah approved a fourth stipulation and order to enlarge discovery plan and scheduling order. This stipulation set the deadline of January 12, 2023 for the Joint Pretrial Order.

Since, the parties have agreed to mediate this matter on March 27, 2023 with Ret. Judge Jennifer Togliatti. Counsel recently conferred regarding an extension of time to submit the parties' Joint Pretrial Order in light of the mediation date. The parties request that the current

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MAINOR WIRTH, LLP 6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148 Phone: (702) 464-5000 | Fax: (702) 463-4440 ///

deadline of January 12, 2023 be extended to April 14, 2023 so that the parties are able to submit a Joint Pretrial Order after participating in mediation.

B. Proposed Revised Pretrial Order Schedule

The Joint Pretrial Order is due on January 12, 2023 and the parties are requesting the deadline be moved to April 14, 2023. This request for an extension of time is not sought for any improper purpose or delay. Rather, it is sought by the parties solely for the purpose of conducting mediation on March 27, 2022. The extension of time will allow the parties to participate in meaningful settlement negotiations through mediation. The parties reasonably believe that this matter can be resolved through mediation, thus saving the time and resources of this Court. Accordingly, the parties respectfully submit that the reasons set forth above constitute compelling reasons and good cause for the short extension.

		ll .		
	1	WHEREFORE, the parties respectfully request that this Court extend the deadline for		
	2	submitting their Joint Pretrial Order from the current deadline to April 14, 2023.		
	3			
	4	DATED this 11th day of January, 2023.	DATED this 11th day of January, 2023.	
	5	MAINOR WIRTH, LLP	THE FELDMAN FIRM	
	6			
	7	<u>/s/ Ash Marie Blackburn</u> BRADLEY S. MAINOR, ESQ.	<u>/s/Rachel Holzer</u> DAVID J. FELDMAN, ESQ.	
	8	Nevada Bar No. 7434	Nevada Bar No. 5947 RACHEL HOLZER, ESQ.	
	9	JOSEPH J. WIRTH, ESQ. Nevada Bar No. 10280	Nevada Bar No.	
~	10	ASH MARIE BLACKBURN, ESQ. Nevada Bar No. 14712	THE FELDMAN FIRM 8831 West Sahara Avenue	
89148 40	11	6018 S. Fort Apache Road, Ste. 150 Las Vegas, NV 89148-5652	Las Vegas, Nevada 89117 Attorneys for Defendant	
gas, NV 8 463-4440	12	Counsel for Plaintiff	11ttottieys for Defendant	
150, Las Ve Fax: (702)	13			
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	15	ODDED		
S. Ft. Apache Rd., Ste. Phone: (702) 464-5000	16	IT IS SO ORDERED.	<u>ORDER</u>	
pache 702) 4	17	111	2022	
Ft. Ap	18	DATED this 11th day of January, 2023.		
6018 S. Pho	19	Council P 2 muchal		
9	20	UNITED STATES MAGISTRATE JUDGE		
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